

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

**Laurie Ortolano,**  
**Plaintiff,**

**v.**

**The City of Nashua, *et al.*,**  
**Defendants.**

**Civil Action No. 1:22-cv-00326-LM**

**EXHIBIT LIST OF THE DEFENDANTS,**  
**STEVEN A. BOLTON AND CELIA K. LEONARD**

Defendants Steven A. Bolton, Corporation Counsel for the City of Nashua, New Hampshire, and Celia K. Leonard, a Deputy Corporation Counsel for the City of Nashua, New Hampshire, respectfully submit the following exhibit list for trial:

<b>Trial Ex.</b>	<b>ID</b>	<b>Date</b>	<b>Description</b>	<b>Bates # USDC Doc. #</b>
A.		8/17/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-1 – Plaintiff email to Nashua Telegraph	71-3
B.		8/27/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-2 – Plaintiff blog post “The Colossal Stupidity of the Nashua Legal Office”	71-4
C.		12/18/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-3 – Plaintiff blog post “The Police Records of Attorney Bolton”	71-5
D.		11/28/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-4 – Plaintiff email to Nashua city officials	71-6
E.		7/18/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-5 – Plaintiff comments at Nashua Board of Alderman meeting	71-7

F.		7/20/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-6 – Plaintiff comments at Nashua Finance Committee meeting	71-8
G.		8/16/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-7 – Plaintiff comments at Nashua Planning and Economic Development meeting	71-9
H.		8/17/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-8 – Plaintiff comments at Nashua Finance Committee meeting	71-10
I.		10/12/22	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-9 – Plaintiff comments at Planning and Economic Development meeting	71-11
J.		3/4/24	Bolton and Leonard's Motion for Summary Judgment, Exhibit A-10 – Plaintiff email to Nashua city officials titled "The Notable Moronic Response from the Nashua's Premier Attorney – Leonard"	71-12* corrected with Doc. 79-1
K.		9/11/19	Bolton and Leonard's Motion for Summary Judgment, Exhibit B-1 – Plaintiff email to Leonard "Clarification of the Legal Office Function"	71-14
L.		1/20/21	Bolton and Leonard's Motion for Summary Judgment, Exhibit B-2 – Vincent email to plaintiff "2 signed Abatement Applications"	71-15
M.		5/8/24	Defendants Bolton and Leonard's Reply to Plaintiff's Objection to Motion Summary Judgment, Exhibit A – Nashua police department photos	78-1
N.		7/12/21	Deposition of Plaintiff Ortolano, Exhibit 6 – 9 <sup>th</sup> Circuit Court, District Division, Nashua, <i>State v. Laurie Ortolano</i> , Case No. 459-2021-CR-00606, Disposition and Sentencing Form	
O.		6/24/22	Deposition of Plaintiff Ortolano, Exhibit 7 – 9 <sup>th</sup> Circuit Court, District Division, Nashua, <i>State v. Laurie Ortolano</i> , Case No. 459-2021-CR-00606, order granting assented to motion to conditionally discharge conviction	

P.		1/22/21	Deposition of Plaintiff Ortolano, Exhibit 4 – 9 <sup>th</sup> Circuit Court, District Division, Nashua, <i>State v. Laurie Ortolano</i> , Case No. 459-2021-CR-00606, Plaintiff email to Board of Aldermen re: “Attorney Leonard should be Fired”	
Q.			Photos and video tour of City Hall	
R.		1/22/21-4/1/22	Chart of Right-to-Know Requests Filed by Ortolano	
S.		1/22/21	Facebook post post-arrest	
T.		6/25/20	Classic Signs, Inc. invoice for “By Appointment Only” sign	
U.		2/18/21	Arrest Warrant for Laurie Ortolano	
V.		2/18/21	Criminal Trespassing Complaint	
W.		1/21/21	Email exchange between plaintiff and Chief Assessor Vincent re: “Totally Unfair Abatement Process”	
X.		2021	Timeline	
X-1		3/11/19	Clarification of the Legal Office	
X-2		1/17 and 1/20/21	Email from Ortolano to Rick Vincent re: “2 signed Abatement Applications – 18 and 28 Baltimore Road”	
X-3		1/21-1/22/21	Email from Plaintiff to Vincent, et al. re “Totally Unfair Abatement Process”	
X-4		1/22/21	Email from Vincent to Plaintiff re: “Here are the abatements signed”	
X-5		1/22/21	Facebook Post on Nashua Scoop re: arrest for trespassing	
X-6		1/22/21	Email from Ortolano to Board of Alderman, et al. re: “Attorney Leonard should be Fired”	
X-7		1/23/21	Union Leader Article re: Nashua woman escorted out of Nashua City Hall by police	
X-8		1/25/21	Nashua Telegraph article re: Police oust public records advocate Ortolano from City Hall	

X-9		1/26/21	Email from Ortolano to Jesse Neumann, et al. re: "Attorney Leonard should be Fired:	
X-10		1/27/21	Union Leader article re: No-trespassing order put in place against Nashua woman	
X-11		1/27/21	Nashua Telegraph article re: "City officials allege Telegraph account of City Hall confrontation 'featured inaccurate information'"	
X-12		1/27/21	Email from Ortolano to Jesse Neumann, et al. re "RTK Request dated 1/26/21 (2021-455) – Re: Attorney Leonard should be Fired"	
X-13		1/30/21	Nashua Telegraph article "Police issue no-trespass order against Laurie Ortolano"	
X-14		2/2/21	Email from Ortolano to Richard Vincent, et al. re: "I almost got arrested over this and I am still waiting 28 Baltimore & 18 Baltimore St stamped receipts"	
X-15		2/3/21	Email from Vincent to Ortolano, et al. re: "I almost got arrested over this and I am still waiting 28 Baltimore & 18 Baltimore St stamped receipts"	
X-16		2/3/21	Union Leader article "Laurie Ortolano won't stop taking on City Hall"	
X-17		2/5/21	Ortolano Facebook Post re: Date Stamping Abatement Applications	
X-18		2/22/21	Ortolano Facebook post: Good Governments Don't Do This	
X-19		2/22/21	Union Leader article "Nashua woman from city hall charged with trespassing"	
X-20		2/26/21	Email from Ortolano to Richard Vincent, et al. re: The Ortolano Abatement Process	
X-21		3/4/21	Board of Assessors meeting minutes	
X-22		3/17/21	Ortolano Facebook post on The Nashua Scoop re: Citizens not receiving proper responses to RTK requests	
X-23		3/18/21	Board of Assessors meeting minutes	

X-24		3/18/21	Ortolano Facebook post re: Mary Todd arrest	
X-25		3/26/21	Granite Grok article by Ortolano re: Nashua's Right Not-to-Know	
X-26		4/11/21	Ortolano Facebook post on The Nashua Scoop re: abatement appeal	
X-27		4/18/21	Ortolano Facebook post on The Nashua Scoop re: Kleiner emails	
X-28		4/26/21	Excerpt of Budget Review Committee meeting minutes	
X-29		4/26/21	Email from Ortolano to Bolton, et al. re: Comments in non-public session made about Spitting	
X-30		4/26/21	Granite Grok post re: Update on Right to Know Lawsuit against Nashua City Hall	
X-31		4/27/21	Email from Ortolano to Bolton, et al. re: Bolton has no ethics	
X-32		4/28/21	Ortolano post on goodgov.org re: A Story About a Crooked Mayor	
X-33		4/29/21	Ortolano Facebook posts with comments about Attorney Leonard and Ortolano's trespass	
X-34		4/30/21	Ortolano post on Granite Grok re: Is Nashua City Right to Know Coordinate Jesse Neumann Just Playing word Salad in his RTK Responses?	
X-35		4/30/21	Email from C. Linder to Nashua Legal Department re: Eliminate the RTK position in the legal office	
X-36		5/3/21	Excerpt from Personnel/Administrative Affairs Committee meeting minutes – Ortolano comments	
X-37		5/3/21	Email from Ortolano to Jesse Neumann, et al. re Your recent RTK request dated April 26, 2021	
X-38		5/10/21	Ortolano post re: Right to Know Demand Made for Selected Nashua City Emails	
X-39		5/11/21	Ortolano post on goodgov.org	
X-40		5/17/21	Excerpt from Budget Review Committee meeting minutes	

X-41		5/20/21	Excerpt from Board of Assessors meeting minutes	
X-42		5/20/21	Excerpt from Budget Review Committee meeting minutes	
X-43		5/26/21	Excerpt from Budget Review Committee meeting minutes	
X-44		5/27/21	Union Leader article re: Nashua ordered to hand over emails initially denied in citizen's Right-to-Know request	
X-45		6/1/21	Excerpt from Budget Review Committee meeting minutes	
X-46		6/1/21	Ortolano post on Granite Grok re: Harassment Warning Requested Against Nashua's Mayor Donchess, Director Kim Kleiner, and Attorney Bolton	
X-47		6/1/21	Union Leader article re: Nashua City Hall to reopen fully on Monday	
X-48		6/2/21	Ortolano email to Nashua Legal Department re: The Incorrect Press Release on the opening of City Hall	
X-49		6/3/21	Excerpt of Public Minutes of the Board of Assessors meeting minutes	
X-50		6/16/21	Excerpt of Report of the Finance Committee meeting minutes	
X-51		6/17/21	Excerpt of Public Minutes of the Board of Assessors meeting minutes	
X-52		6/17/21	Excerpt of Budget Review Committee meeting minutes	
X-53		6/22/21	Union Leader article re: Nashua spending out of control, residents tell city officials	
X-54		6/23/21	Email from Ortolano to Board of Alderman, et al. re: Last Night's shocking Board of Alderman Meeting	
X-55		6/24/21	Ortolano post on Granite Grok re: Nashua Should be Ashamed of its Attorney Bolton	

X-56		6/26/21	Nashua Telegraph article re: Some residents criticize mayor's proposed 2022 budget	
X-57		6/28/21	Nashua Telegraph article re: Nashua homeowner wins tax abatement appeal; is granted attorneys' fees in separate RTK case against city	
X-58		6/30/21	Excerpt from Public Minutes of the Board of Assessors meeting minutes	
X-59		6/30/21	Email from Ortolano to Mayor's office re: Revised Bail order since my arrest	
X-60		7/3/21	Ortolano post on goodgov.org re: The Broken Nashua Court System	
X-61		7/6/21	Email from Ortolano to Legal Department re: Bolton is ridiculous	
X-62		7/8/21	Email from C. Linder to Legal Department re: Attorney Bolton's Job Performance	
X-63		7/19/21	Ortolano Facebook post on The Nashua Scoop re: tension between Attorney Bolton and Alderwoman Lu	
X-64		7/22/21	Ortolano post on goodgov.org re: Deputy Attorney Leonard's Misrepresentations	
X-65		7/22/21	Ortolano Facebook post on The Nashua Scoop re: Attorney Leonard's misrepresentation	
X-66		7/22/21	Email from Ortolano to D. Graham, et al. re: My Arrest in City Hall	
X-67		7/23/21	Ortolano post to Granite Grok re: It's a Bad Look to Arrest Citizens in City Hall	
X-68		7/28/21	Nashua Telegraph article re: Nashua homeowner wins tax abatement appeal; is granted attorneys' fees in separate RTK case against city	
X-69		7/30/21	Ortolano post to goodgov.org re: Rebuttal to Attorney Bolton's explanation for failure to deliver emails – July 28, 2021 Telegraph article	

X-70		8/2/21	Email from Ortolano to Bolton, et al. re: FBI Investigation – The Confidential email posted by Sonia Prince on Social Media	
X-71		8/3/21	Ortolano post to goodgov.org re: Bolton ignores Court order to drive-up Legal Fees	
X-72		8/4/21	Excerpt of Report of the Finance Committee meeting minutes	
X-73		8/5/21	Ortolano post to goodgov.org re: A Hostile City Government	
X-74		8/17/21	Ortolano post to goodgov.org re: More Attacks on Alderwoman Lu – Mayor Donchess fires down	
X-75		8/17/21	Email from Ortolano to Board of Aldermen, et al. re: Phone Calls this morning for court hearing	
X-76		8/18/21	Excerpt of Report of the Finance Committee meeting minutes	
X-77		8/23/21	Excerpt of Budget Review Committee meeting minutes	
X-78		8/23/21	Ortolano post to goodgov.org re: The Nashua Legal Office – Case Study for the Abuse of the Attorney Client Privilege Exemption	
X-79		8/25/21	Ortolano post to Granite Grok re: Nashua Provides Case Study for the Abuse of the Attorney-Client Privilege Exemption to RTK Law	
X-80		8/26/21	Excerpt of Public Minutes of Board of Assessors Meeting minutes – Ortolano public comment	
X-81		8/26/21	Board of Assessors Meeting – video of Ortolano public comment	
X-82		8/30/21	Email from Ortolano to Board of Aldermen, et al. re: The Mayor’s sanctioned abuses of the Nashua Legal Office	
X-83		8/31/21	Ortolano post to goodgov.org re: Mayor Donchess’ Sanctioned Abuses of the Nashua Legal Office	
X-84		8/31/21	Ortolano post to Granite Grok re: Our Board of Aldermen Have Become the Mayor’s Posse	



X-85		9/1/21	Ortolano Facebook post to The Nashua Scoop re: running for DWP commissioner	
X-86		9/16/21	Ortolano post to goodgov.org re: Elect Laurie Ortolano for the Board of Public Works	
X-87		10/9/21	Ortolano post to goodgov.org re: City Refuses to Pay on Court Order Sanctions	
X-88		10/9/21	Ortolano post to Granite Grok re: Nashua: Local Elections ARE Partisan!	
X-89		10/16/21	Nashua Telegraph Article re: City Workers Deserve Respect	
X-90		10/30/21	Email from Ortolano to Bolton, et al. re: Leaked Attorney Client Information	
X-91		10/31/21	Email from Ortolano to Bolton, et al. re: Attorney Client Information Leak, Again	
X-92		11/12/21	Ortolano post to goodgov.org re: The Nashua Legal Offices abuse of Seniors	
X-93		11/13/21	Ortolano post to Granite Grok re: The Nashua Legal Offices Abuse of Seniors	
X-94		12/15/21	Ortolano post Granite Grok re: Nashua's Thug Leadership	
X-95		01/16/22	Ortolano post to Granite Grok re: Nashua City Attorney Steve Bolton is Unfit for Duty	
X-96		08/27/22	Ortolano post to goodgov.org re: The Colossal Stupidity of the Nashua Legal Office	
X-97		5/21/24	Email from M. Perry to Ortolano re: RTK Request 2024-146-OCC	
Y			Sketch of Legal Department office	

The defendants Bolton and Leonard reserve the right to revise and supplement this Exhibit List through the time of trial.